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THE MASTROMARCO FIRM  
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Hearing Date: 9/14/06  
Hearing Time: 10:00 a.m.  
Objection Deadline: 9/7/06

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

DELPHI CORPORATION, et al.,

Chapter 11  
Case No. 05-44481 (RDD)  
(Jointly Administered)

Debtors.

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**H.E. SERVICES COMPANY AND ROBERT BACKIE'S**  
**MOTION TO EXTEND TIME TO FILE APPEAL**

The Movants, H.E. Services Company, and Robert Backie, Majority Shareholder, by and through their attorneys, files this Motion to Extend the Time for Filing an Appeal for the reasons as set forth below:

1. That on August 10, 2006, the Court issued an Order denying Movants' Motion for Relief from Stay.
2. That pursuant to Rule 8002 (a) it appears that the Movants have ten (10) days in which to seek leave to appeal this Court's decision with the District Court.
3. That Movant's Counsel is currently seeking to be admitted pro hac vice with the District Court and additional time is needed so that Counsel can take the necessary steps to be admitted with District Court for the Southern District of New York for the purpose of representing Movants before the District Court, or in

the alternative to retain local counsel to represent Movants before the District Court.

4. That good cause exists for an extension and the Movants hereby requests, pursuant to Rule 8003, an extension of twenty (20) days from the current notice of appeal deadline or an extension of (10) days from entry of an order granting the extension whichever is later.
5. That the Court has the discretion to grant the relief requested pursuant to Rule 8002 (c).
6. Since the legal authority in support of the relief requested by this motion are recited above, the Movants respectfully requests that the requirement of the service of filing of a separate memorandum of law under Local Rule 9015-1 (b) (S.D.N.Y.) be deemed satisfied.
7. Notice of this motion has been provided pursuant to the Case Management Order entered by this Court on October 14, 2005, (as amended) establishing notice procedures in these bankruptcy cases. No further notice is required. No previous motion for the relief requested herein has been made in this or any other court.

Wherefore, the Movants request the above-mentioned extension.

Dated: August 18, 2006

Respectfully submitted,

THE MASTROMARCO FIRM

s/ Victor J. Mastromarco, Jr.  
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